



Fw: QAPP Requirements for Sampling during Removal Activities

VERNETA SIMON to: Ernesto Manzon, Mark Bedford, Phillip Brown, Gordon Clarke

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Cc: Cathleen Martwick, Mary Fulghum

Please only add the below memo to the DuSable Park Administrative Record and SDMS File. Thanks,
Verneta

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MEMORANDUM

Date: January 30, 2009

To: Region 5 OSCs

From: Jason El-Zein, Chief, ERB1
Linda Nachowicz, Chief, ERB2

Re: QAPP Requirements for Sampling during Removal Activities

As discussed during OSC training this past January, this memo is to make you aware of the requirements for developing Quality Assurance Project Plans (QAPPs) when conducting removal activities. Per OSWER directive 9360.4-20FS, On-Scene Coordinators (OSCs) are required to ensure that QAPPs are completed for fund-lead or potentially responsible party (PRP) lead removal sites where sampling will be conducted. Recognizing that OSCs are often conducting activities in an emergency or rapid assessment mode, it is unreasonable to expect that a full QAPP be developed in those situations. However, OSCs still have an obligation to provide quality documentation of their sampling activities, including an appropriate plan. In these situations, a Field Sampling Plan (FSP) that meets the minimum requirements of an appropriate QA Sampling and Analysis Plan (SAP) must be developed. The minimum requirements of an FSP are the number, type, and location of samples and the types of analyses. With this understanding, here are the requirements that OSCs have when samples are to be collected:

- **Emergency Response:** A FSP must be developed for all sampling events where a laboratory will be used to provide analysis. The FSP can be a fill-in-the-blank form.
- **Site Assessments:** A FSP must be developed for all sampling events where a laboratory will be used to provide analysis. As appropriate, the Site Assessment FSP should be developed in advance and be approved by the OSC.
- **Removal Actions (non-Emergency):** For all sampling events where analytical data will be used to make environmental decisions (i.e. confirmation sampling, extent of contamination) and a laboratory will be used to analyze the samples, a QAPP is required in addition to the FSP. A QAPP describes the policy, organization, and functional activities and the data quality objectives and measures necessary to achieve adequate data for use in



planning and documenting the removal action. The FSP and the QAPP together make up the QA SAP.

- **Note:** Disposal sampling, monitoring, haz-cat analysis, screening analysis do not require a QAPP; however an FSP is recommended.

If a QAPP is required, these are the steps that must be followed:

- Generate the QAPP, using the proper forms (located on the R5 QuickPlace site). The process can take up to three days to complete depending on the complexity of the sampling event.
- Submit the draft QAPP to the Chief of the Field Service Section (Steve Ostrodka) for review and comment by his staff.
- Initiate the sampling event under the draft QAPP. If necessary, this can be done prior to receiving comments.
- Once comments are received, address and incorporate any changes and finalize the document via signature.

Our primary START contractor, Weston Solutions, has developed guidance for their staff for developing QAPPs and FSPs. Their guidance provides more details about the nature of the various sampling plans. The START guidance can also be found on QuickPlace.

If you have any questions or concerns regarding these requirements, please contact any of the following people:

- Mark Durno or Charlie Gebien, Removal Section Chiefs
- Verneta Simon, QAPP liaison, Response Section 3
- Steve Ostrodka, Chief, Field Services Section
- Ida Levin, QAPP manager, Field Services Section
- Gail Stanuch, Project Officer, Response Section 1